

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

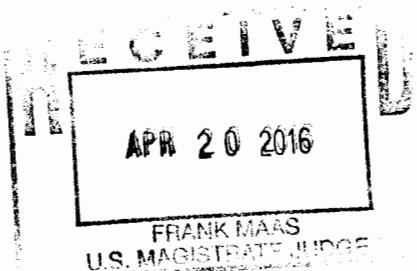
In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, Co-Chair MOTLEY RICE LLC James P. Kreindler, Co-Chair KREINDLER & KREINDLER LLP	Elliot R. Feldman, Co-Chair Sean Carter, Co-Chair COZEN O'CONNOR
Andrew J. Maloney III, Co-Liaison Counsel KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., Co-Liaison Counsel SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, Liaison Counsel COZEN O'CONNOR

Via ECF and FedEx

April 19, 2016

Magistrate Judge Frank Maas
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St., Room 740
 New York, NY 10007

**MEMO ENDORSED**

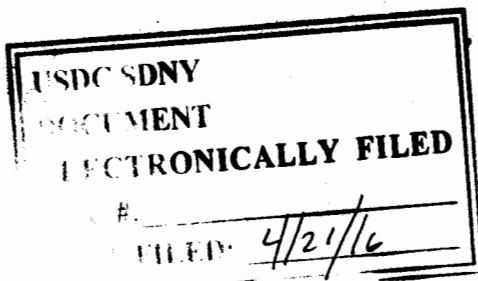
Re: In Re: Terrorist Attacks on September 11, 2001,
03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of the O'Neill, Ashton, and Federal Insurance Plaintiffs, I am writing to request the deadline to respond to the Havlish counsel's Motion for Creation of a Common Benefit Fund (ECF No. 3235) be extended from April 22, 2016 to May 2, 2016. See ECF No. 3241.

In light of other significant conflicting demands on counsel time in the past ten (10) days, we will be unable to complete the preparation of the appropriate response which the application deserves.

I have repeatedly asked movants' counsel for their position on this request but unfortunately have not received a response.



APPLICATION GRANTED

SO:

Frank Maas, USMJ 4/21/16

Magistrate Judge Frank Maas

April 19, 2016

Page 2

Accordingly, in the interest of justice, we are requesting an extension from the present due date until May 2, 2016.

Respectfully submitted,

Jerry S. Goldman
Anderson Kill PC
FOR THE O'NEILL, ASTON and FEDERAL
INSURANCE PLAINTIFFS

cc: The Honorable George B. Daniels (via FedEx)
All Counsel of Record (via ECF)